Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
Revision of the Commission's Rules	)	CC Docket No. 94-102
to Ensure Compatibility with Enhanced	)	
E911 Emergency Calling Systems	)	
	)	

To: The Commission

Carrier Report of SpectraCom, Inc. Regarding
Implementation of Wireless E911 Phase II Automatic Location Identification

SpectraCom, Inc. d/b/a PYXIS Communications ("PYXIS") hereby submits a report regarding implementation of wireless E911 Phase II Automatic Location Identification ("ALI"), in compliance with the Federal Communications Commission's ("FCC" or "Commission") Further Memorandum Opinion and Order in the above-captioned proceeding.

I.   Background / Contact Information

PYXIS serves rural Wyoming and its contact information is as follows:

Stephen Jantz
Manager

SpectraCom, Inc. d/b/a PYXIS Communications (TRS# 819234)
130 S. 9th
P.O. Box 506
Worland, WY 82401
telephone: (307) 347-7770
fax: (307) 347-9200
email: sjantz@pyxiscom.com

II.   E911 Phase II Location Technology Information

PYXIS has yet to choose a solution for its Phase II ALI technology. However, PYXIS is leaning toward a handset solution. While PYXIS remains undecided at this point due to its concern about general handset availability, it is leaning heavily toward handsets if a product becomes available and is proven to work within the time frame necessary for PYXIS to achieve Phase II implementation in compliance with the

Commission's rules.[1] Whichever technology PYXIS selects, it intends to deploy it throughout its service area.

III.   Testing and Verification

PYXIS has yet to test any ALI solutions since it is still examining available products. In addition, PYXIS has not been able to test any handsets since none are available and PYXIS has yet to be given a date when ALI-capable handsets will be available. PYXIS anticipates using a combination of Empirical Testing Methods and Predictive Testing Methods to gauge the accuracy of the technology it eventually chooses.

IV.   Implementation Details and Schedule

While PYXIS is awaiting product availability from handset vendors, it has developed a tentative implementation schedule to meet the FCC's handset-based rules and, if necessary, network-based rules. PYXIS will make its technology choice by the first quarter of 2001. If PYXIS chooses a handset solution, it will begin selling ALI-capable handsets on October 1, 2001 as the FCC's rules require. PYXIS will continue to evaluate network-based ALI solutions and, if it chooses a network solution, intends to select and deploy a technology after the first quarter of 2001, once it has made its choice. PYXIS will accelerate this schedule to the extent necessary upon receipt of a PSAP request.

V.   PSAP Interface

PYXIS has yet to receive a Phase II PSAP request.[2] Most of the PSAP interface details will depend upon the technology PYXIS chooses and the specific requests of the PSAP.

VI.   Handset Information

If PYXIS decides to pursue a handset-based solution, it will run promotions in order to replace existing handsets. The price of the new ALI-capable handsets, unavailable at this time, will affect PYXIS' replacement strategy.

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[1] PYXIS has been researching many different Phase II vendors and their potential product offerings. These companies include Nortel, Snap Track, SCC Communications, Technocom Corporation, GTE Telecommunications Services, Cell-Loc, True Position, US Wireless, and SigmaOne Communications Corporation.

[2] In general, the following hardware and software is needed to transmit Phase II data to PSAPs: IS41C – Dialed Number Trigger, E911 Software, MPC – Mobile Positioning Center, PDE – Position Determining Entity, and receivers at each cell site.

VII.   Other Information

PYXIS notes that the remote and rural nature of its service territory in Wyoming can present additional and unforeseen problems when installing and testing location technology. PYXIS would have a much better handle on how it will eventually implement its Phase II plan if the vendor products were available for testing. Unfortunately, PYXIS' Phase II implementation plan depends, in large part, upon the schedules and plans of the vendors.

November 9, 2000